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8 *d/b/a Access Secure Release*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 CHRISTOPHER WATKINS, on behalf of  
himself and all others similarly situated,

12 Plaintiff,

13 v.

14 RAPID FINANCIAL SOLUTIONS, INC.  
15 d/b/a/ ACCESS FREEDOM CARDS; AXIOM  
BANK N.A.; KEEFE COMMISSARY  
16 NETWORK, LLC d/b/a ACCESS SECURE  
RELEASE; and DOES 1 through 10, inclusive,

17 Defendants.

Case No. 3:20-cv-00509-MMD-CSD

**STIPULATION TO EXTEND  
DEFENDANT KEEFE COMMISSARY  
NETWORK, LLC D/B/A ACCESS SECURE  
RELEASE'S RESPONSE DEADLINE TO  
PLAINTIFF'S FIRST AMENDED CLASS  
ACTION COMPLAINT**

**(FIRST REQUEST)**

18 Defendant Keefe Commissary Network, LLC ("Keefe") and Plaintiff Christopher Watkins  
19 ("Plaintiff"), by and through by and through their respective counsel of record, hereby agree and  
20 request that the Court extend the deadline for Keefe to respond to Plaintiff's First Amended Class  
21 Action Complaint which is currently set for April 27, 2022, by 21 days to May 18, 2022.

22 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
23 requested extension as Keefe's counsel has recently been retained and needs additional time obtain  
24 and review documents to investigate the allegations of the complaint. Accordingly, the parties agree  
25 that the requested extension furthers the interest of this litigation and is not being requested in bad  
26 faith or to delay these proceedings unnecessarily.  
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1 This is the parties' first request for extension of these deadlines.

2 DATED this 26th day of April, 2022.

3 WILSON, ELSE, MOSKOWITZ, EDELMAN  
4 & DICKER LLP

5 By: /s/ Sheri M. Thome  
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15 *Keefe Commissary Network, LLC*  
16 *d/b/a Access Secure Release*

11 DATED this 26th day of April, 2022.

12 THIERMAN BUCK, LLP

13  
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**ORDER**

**GOOD CAUSE SHOWN, IT IS SO ORDERED.**

Dated this 26th day of April, 2022.



UNITED STATES MAGISTRATE JUDGE